



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3123

OFFICE OF
ENVIRONMENTAL
CLEANUP

Mr. Brick Spangler
Environmental Program Manager
Port of Seattle
PO Box 1209
Seattle, Washington 98111

Dear Mr. Spangler:

The U.S. Environmental Protection Agency has reviewed the draft Final Feasibility Study submitted by the Port of Seattle on November 3 2017, as part of the Supplemental Remedial Investigation and Feasibility Study for the East Waterway Operable Unit of the Harbor Island Superfund Site. The EPA approves of this document upon the specified conditions that (1) the exact editing revisions shown on the attached tables and in the enclosed Appendix A Part 1 be made to the FS; and (2) there be no other changes made to the FS.

The EPA is requiring removal of all references to the Washington State Department of Ecology developed natural background and practical quantitation limit values. References to Ecology guidance as a basis for any decisions made by the EPA must also be removed.

The EPA is further requiring significant revisions to Appendix A Part 1 "Compliance with Sediment Management Standards" in order to correctly characterize cleanup projections and the potential application of State guidance and laws.

In addition, the EPA is requiring the recalculation of cancer and non-cancer risks for cPAHs based on the revised IRIS toxicity values for benzo[a]pyrene established by the EPA in 2017. This includes making the appropriate changes to text, tables, and figures in Section 3 and any other affected sections of the draft FS. If changes result in the cancer risk dropping below 10^{-6} for a given pathway, contact the EPA to determine whether changes in remedial action objectives or preliminary remediation goals and remedial action levels are needed before resubmission of the draft FS.

Within 30 days upon receipt of this notice, the final corrected version of the draft FS must be submitted to the EPA. Should you have any questions, I can be contacted at (206) 553-4092, or by email at sanga.ravi@epa.gov. Inquiries from legal counsel should be sent to Richard Mednick at (206) 553-1797 or mednick.richard@epa.gov.

Sincerely,

Ravi N. Sanga
Remedial Project Manager

cc: Mr. Dan Berlin, Anchor QEA LLC
Mr. William Gardiner, U.S. Army Corps of Engineers
Ms. Kayla Patten, U.S. Army Corps of Engineers
Mr. Pete Rude, Seattle Public Utilities
Ms. Rebecca Rule, U.S. Army Corps of Engineers
Mr. Jeff Stern, King County Department of Natural Resources
Mr. Tom Wang, Anchor QEA
Ms. Debora Williston, King County Department of Natural Resources